



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

AUG 11 2014

CERTIFIED MAIL 7010 1060 0002 1705 3917  
RETURN RECEIPT REQUESTED

City of Jackson  
Attn.: The Honorable Tony T. Yarber  
Mayor, City Hall  
219 South President Street  
Jackson, Mississippi 39205

Re: Wastewater Treatment Plant Operations and Maintenance Program  
City of Jackson, Mississippi Consent Decree  
Case No.: 3:12-cv-790 TSL-JMR

Dear Mayor Yarber:

The U.S. Environmental Protection Agency Region 4 has consulted with the Mississippi Department of Environmental Quality (MDEQ) upon reviewing the City of Jackson's (the City) Wastewater Treatment Plant (WWTP) Operations and Maintenance (O&M) Program dated May 30, 2014, pursuant to Section V. of the subject Consent Decree above. The EPA and the MDEQ have identified the following questions and issues needing additional clarification.

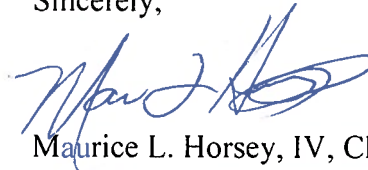
WWTP O&M Program Comments

1. Section 4.3 Storm Cell Sludge (page 27): This description states that there is a return line from Storm Cell #3 to the West Bank Interceptor that can be used to return flows stored in the storm cells to the WWTP for treatment. Is this a new (or rehabilitated) return line, as EPA was under the impression it was not possible to return flows to the WWTP? There also appears to be a typo, as the correct Figure referenced in this first paragraph is Figure 4-2 (not Figure 4-1).
2. Section 5.1 UWS-MS Preventative Maintenance (PM) Program (pg. 30): In the 4<sup>th</sup> bullet, it is stated that "The SCADA interface also allows run time-based preventive maintenance work-order triggers. The interface can also generate condition- and predictive-based orders that incorporate any combination of sensors (vibration, temperature, or pressure) or equipment usage being monitored." Does the City or UWS-MS actually use the interface to trigger run time based PM work orders? Also, does the City or UWS-MS actually generate condition-based and/or predictive-based work orders via sensors (if so, please list what equipment has sensors and what type sensor it is)?

3. There appears to be a few typos in the WWTP O&M Program submittal as well. One is in Appendix A on page A-5 (1<sup>st</sup> sentence below the bullet items), where the City used the acronym “EPD” when it meant to use “EPA.” Another is found in Appendix B on page 4 of 15 (4<sup>th</sup> bullet) where the City uses “... West Ranking Gate #1” (should be West Rankin Gate #1). Finally, in the first sentence under “Operations Staff Qualifications” (pg. 34), it is assumed the City meant to state “The United Water **Operations** [not Maintenance] Department has 34...”
  4. As noted in the Savanna Street WWTP CPE, the City has not inspected, much less maintained or cleaned, the aeration basin diffusers since their installation in 1996, which are currently 1.5 times their normal design life. The CPE further states that WEF MOP 11 suggests annual inspection/cleaning. Please provide a schedule for the inspection and maintenance/cleaning of these diffusers.
  5. Paragraph 42.(c)(ii) requires the City to develop and implement standard procedures to conduct preventive maintenance of WWTP equipment. The WWTP O&M Program continually states that United Water conducts preventive maintenance and tracks that in the EPortal computer system, but it appears that not all equipment is on a preventive maintenance schedule (e.g. the aeration basin diffusers mentioned above). Please provide a list and schedule of preventive maintenance for all major unit processes.
  6. The WWTP O&M Program includes Standard Operating Procedures (SOPs) for only two pieces of equipment (the sludge belt filter presses and the sludge dewatering centrifuge) and SOPs for three different events (Wet Weather Operating Plan; WWTP Power Failure and Pump Station Control Panel Damage from traffic accidents). The WWTP O&M Plan should include SOPs for operation of all major unit processes.
  7. The Savanna Street WWTP Bypass Minimization and Wet Weather Operating Plan in Appendix B states that during wet weather events where the influent pump station wet well continues to rise but flows to the WWTP have not been maximized that staff should “Discontinue Dewatering process and sludge wasting to minimize in-plant recycle flows and their impact on the diversion flow” after notifying the Operations Manager (pg. 8 of 15; 2<sup>nd</sup> bullet under heading number 3). This seems illogical as ceasing sludge wasting will increase the need for in-plant recycle flows (less wasting equals more recycle). Please explain what is meant here.
  8. Please provide a schedule for reviewing and updating the WWTP O&M Program (e.g. the City will review and update, as necessary, the WWTP O&M Program on an annual basis).
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The EPA will approve the WWTP O&M Program pending a timely and complete response to the above comments. Pursuant to Section V, Paragraph 13 of the Consent Decree, please respond in writing within 30 days of receipt of this letter. If you should have any questions regarding the above comments, please contact Mr. Brad Ammons at (404) 562-9769 or via email at [ammons.brad@epa.gov](mailto:ammons.brad@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Maurice L. Horsey, IV", is written over the typed name.

Maurice L. Horsey, IV, Chief  
Municipal & Industrial Enforcement Section  
Clean Water Enforcement Branch

cc: Mr. Les Herrington, P.E.  
Mississippi Department of Environmental Quality

Mr. Terry Williamson  
City of Jackson

Ms. Keisha Powell  
City of Jackson

